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Attorneys for Plaintiff Evanina Alaniz, individually
and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA**COUNTY OF ORANGE**

In re WATER WAGE AND HOUR CASES

Coordination Proceedings Special Title
(C.R.C. Rule 3.550)

Included Actions:

*Daniel Carillo-Salazar v. Watermark Services, IV,
LLC, et al.*

Orange County Superior Court
Case No. 30-2020-01126766-CU-OE-CXC

*Evanina Alaniz v. Watermark Retirement
Communities LLC, et al.,*

Los Angeles County Superior Court
Case No. 20STCV16386

*Katherine Greene v. Watermark Retirement
Properties, Inc., et al*

Monterey County Superior Court
Case No. 20CV002422

Judicial Counsel Coordination Proceedings No.
JCCP 5176

Assigned for all Purposes to the Honorable
William Claster, Dept. CX104

**DECLARATION OF PLAINTIFF
EVANINA ALANIZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 I, Evanina Alaniz, hereby declare as follows:

2 1. I am one of the named Plaintiffs in the above-entitled matter.

3 2. I am making this declaration in support of Plaintiffs' Motion for Preliminary Approval
4 of Class Action Settlement. I have personal knowledge of the matters stated herein and could and
5 would competently testify thereto.

6 3. I worked for Defendants as a Caregiver from approximately October 2018 to January
7 2020.

8 4. Based on my experience and knowledge of Defendants' wage and hour policies and
9 my familiarity with its employment practices, I worked with my attorneys to bring claims on my
10 behalf and on behalf of the other employees at Defendants.

11 5. I am seeking to become a Class Representative in this case for the purpose of having
12 the Settlement Agreement approved. I believe my experiences are similar to other employees who
13 worked for Defendants. I believe we were all subject to the same employment policies and practices.

14 6. I do not have conflicts with other employees that would hinder my ability to represent
15 them. Therefore, I believe I can adequately represent the other non-exempt employees of Defendants.

16 7. My interests as a named plaintiff in this litigation are not adverse to the interest of the
17 other employees. My interests are the same as the interests of the other employees because we were
18 all subject to the same policies and practices and were similarly injured by Defendants' company-
19 wide policies and practices. I am seeking the same recovery on behalf of myself and other employees,
20 which is to collect unpaid wages, interest, and penalties that are owed by Defendants, pursuant to the
21 Settlement Agreement.

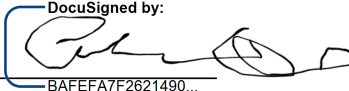
22 8. I have always kept the best interests of the other employees in mind while performing
23 my duties as one of the named plaintiffs in this action. I have been committed throughout the course
24 of this litigation to vigorously prosecuting this case on behalf of myself and the other employees. I
25 believe that I have demonstrated my ability to advocate for the interests of the other employees by
26 initiating this lawsuit, providing documents to my attorneys pertaining to my employment with
27 Defendants, going over the claims and theories with my attorneys, keeping in regular contact with
28

1 my attorneys regarding the status of this lawsuit, helping my attorneys evaluate the case for
2 settlement, and reviewing the settlement agreement and its terms to make sure it was fair.

3 9. I will continue to actively participate in this lawsuit as necessary, and will continue to
4 make myself available to assist in this case in the future as needed.

5
6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct.

8 Executed on 8/31/2022, 2022, at whittier, California.

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11 The image shows a DocuSign signature block. It includes the text "DocuSigned by:" above a blue ink signature. Below the signature is a blue rectangular box containing the alphanumeric string "BAFEFA7F2621490...".

12 Evanina Alaniz
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